

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

*

v.

*

Criminal No. SAG-20-0065

JESSE MEARS

*

* * * * * * * * * * * * *

**MOTION TO EXTEND THE DEADLINE TO FILE A REPLY TO THE
GOVERNMENT’S CONSOLIDATED RESPONSE IN OPPOSITION TO THE
DEFENDANT’S POST-TRIAL MOTIONS**

Jesse Mears, through counsel, respectfully moves for an additional two-week extension to file a Reply to the Government’s Opposition to the Defendant’s Post-Trial Motions. Mr. Mears states as follows:

1. On April 12, 2021, a jury returned a guilty verdict on the one count indictment in this case, finding Mr. Mears guilty of illegal possession of a firearm and ammunition in violation of 18 U.S.C. § 922(g).

2. On April 23, 2021, Mr. Mears filed an Omnibus Motion to Suppress Physical Evidence, Set Aside the Verdict, and Enter Judgement of Acquittal, or in the Alternative, Motion for a New Trial and Memorandum in Support. ECF No. 112.

3. The Government was granted a two-week extension to file its response to Mr. Mears’ Motion. ECF No. 119. On May 21, 2021, the Government filed its Opposition to the Defendant’s Post-Trial Motions. ECF No. 123.

4. Mr. Mears’ Reply to the Government’s Opposition was originally due on June 4, 2021. At Mr. Mears’ request the Court extended this deadline to June 18, 2021, so that the parties could attempt to resolve by agreement the matters presently before the Court. ECF No. 125.

5. The parties have had constructive negotiations but need additional time to attempt to resolve these matters, and so Mr. Mears requests an additional two-week extension to continue these discussions.

6. The Government consents to this request.

For these reasons, Mr. Mears moves for a two-week extension of the deadline to file his Reply to the Government's Opposition. If the two-week extension is granted, Mr. Mears' Reply will be due on or before July 2, 2021.

Respectfully submitted,

JAMES WYDA
Federal Public Defender

/s/

David Walsh-Little (#23586)
Maggie Grace (#29905)
Assistant Federal Public Defenders
Office of the Federal Public Defender
100 South Charles Street
Tower II, 9th Floor
Baltimore, Maryland 21201
Phone: 410-962-3962
Fax: 410-962-0872
Email: david_walsh-little@fd.org
maggie_grace@fd.org